

# EXHIBIT EE

# **Deposition of Daniel Reynoso**

**Reyes, et al. v. Chilton, et. al.**

**May 20, 2023**



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1 A. Yes.

2 Q. I would like you to turn to page 6, paragraph  
3 22. And the page numbers are on the top right and  
4 specifically paragraph 22.

5 That paragraph reads, "In 2018, Mr. Reynoso  
6 signed his own ballot, and his ballot was rejected for a  
7 mismatched signature." Did I read that correctly?

8 A. Yes, ma'am.

9 Q. When you say you had your -- or when this  
10 complaint says that your ballot was rejected for  
11 mismatched signature, what does it mean that your ballot  
12 was rejected for a mismatched signature?

13 MR. MORFIN: Objection. Form. Go ahead.

14 A. That my signature was not accepted or someone  
15 else wrote my signature.

16 Q. (By Ms. Castillo) Do you recall which election  
17 in 2018 that your ballot was rejected?

18 A. No.

19 Q. And then the next paragraph 23 says,  
20 "Mr. Reynoso was unable to cure his ballot and his  
21 ballot was rejected." Did I read that correctly?

22 A. Yes.

23 Q. Why were you unable to cure your ballot?

24 MR. MORFIN: Objection to form.

25 A. Because at the time, my ballot mail was still

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1 going to my mom and dad's residence, which is 307 1/2  
2 North Harding, and when they let me know that I had it,  
3 it was too late to already submit it. It was past  
4 overdue.

5 Q. Do you know when your parents received the  
6 notice that your ballot had been flagged for signature  
7 mismatch?

8 A. No.

9 Q. Do you recall when she gave you the notice -- or  
10 your parents gave you the notice, excuse me?

11 A. No.

12 MR. MORFIN: Objection. Form.

13 Q. (By Ms. Castillo) How often were you checking  
14 your mail received at your parents' address?

15 A. I wasn't. My parents would notify me when I  
16 would get mail.

17 Q. Would they usually notify you that day?

18 A. No.

19 MR. MORFIN: Objection. Form.

20 Q. (By Ms. Castillo) Would they notify you on,  
21 like, a weekly basis?

22 MR. MORFIN: Objection. Form.

23 A. No.

24 Q. (By Ms. Castillo) Did you receive other  
25 sensitive mail at that address, such as bills?

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1 MR. MORFIN: Objection. Form.

2 A. No.

3 Q. (By Ms. Castillo) Do you know what it means to  
4 have slow writing?

5 MR. MORFIN: Objection. Form.

6 A. Yes.

7 Q. (By Ms. Castillo) And what is that?

8 A. When you're actually taking your time.

9 Q. Mr. Reynoso, do you think your signature has  
10 changed over time?

11 MR. MORFIN: Objection. Form.

12 A. No.

13 Q. (By Ms. Castillo) But now you use three  
14 initials rather than your full name in your signature?

15 A. Correct.

16 Q. When did you start using the three initials?

17 A. At the time that my signature was forged at a  
18 Star Rental place or where you rent equipment at.

19 Q. When did that forgery occur?

20 A. In 2018.

21 Q. Do you recall when in 2018?

22 A. No.

23 Q. What happened with the signature forgery in  
24 2018?

25 MR. MORFIN: Objection. Form.

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1           A. The day I was trying to get equipment from Star  
2 Rentals, they told me that I had an outstanding balance  
3 due to equipment rental, which I never did. That was my  
4 first time in that place and trying to rent something,  
5 and someone had rented stuff under my name.

6           Q. (By Ms. Castillo) Did you report that to the  
7 police?

8           A. No.

9           Q. How did you resolve it with the rental equipment  
10 company?

11          A. I -- I couldn't. They said they couldn't do  
12 nothing about it because it matched my signature and  
13 everything, and I had never rented anything from there  
14 before.

15          Q. And when you say it had matched your signature,  
16 was that on a receipt?

17          A. That was on a receipt. They had it in file on a  
18 pad, obviously in their computer system they had it.

19          Q. So if you had your signature forged in 2018 in  
20 the rental equipment and then you also received a notice  
21 from Yakima County that the signature on your ballot in  
22 Exhibit 4 did not match the signature in your voter  
23 registration file, were you concerned that somebody was  
24 out there forging your signature?

25          MR. MORFIN: Objection to form. Go ahead.

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1 A. I know who -- the reason why this one is a lot  
2 more different than my signature to the one that they  
3 had in file was because this one here, I was telling my  
4 wife of how my parents -- or my father actually wanted  
5 me to have the best handwriting, which I never did. And  
6 so at the time, when me and my wife were sitting at the  
7 table, this was literally my signature back in the 6th  
8 grade in cursive, so then that's how I wrote it just for  
9 that fact.

10 And that's when -- and this one here is  
11 different because it's just like a scribble. I wasn't  
12 trying to be as careful as I was here. And obviously,  
13 cursive writing is different than just a scribble.

14 Q. When you're referring to "this," just so we have  
15 a clear record, the signature that you're referring to  
16 with the careful signature is Exhibit 4, the ballot  
17 signature --

18 A. (Witness nodded.)

19 Q. -- on your declaration form?

20 And then the signature that is scribbly and not  
21 careful is the Exhibit -- I've already forgotten -- 6 of  
22 Yakima\_041320?

23 A. (Witness nodded.)

24 Q. Do you think it's important that the county  
25 elections office compare signatures in order to make

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1 sure that somebody isn't forging a signature on a  
2 ballot?

3 A. No.

4 Q. Why not?

5 A. Because I think it's more that the vote that  
6 counts, not their signature. They are not going upon  
7 their signature, they're going upon their vote.

8 Q. Do you think it's important for the county to  
9 know the name of an individual who is voting so that  
10 they can credit them for their voting history?

11 A. Yes. Yes.

12 Q. Other than the 2018 ballot declaration signature  
13 issue and the 2018 rental equipment signature forgery,  
14 has there ever been any other time that your signature  
15 has come up at issue?

16 A. No.

17 Q. Have you ever spoken with anyone at the Yakima  
18 County elections office?

19 A. No.

20 Q. Have you ever gone in person to the Yakima  
21 County elections office?

22 A. No.

23 Q. Have you ever sent an email to the Yakima County  
24 elections office?

25 A. No.



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1 Q. Have you ever gone to see the -- the election  
2 process performed by election staff in Yakima County?

3 A. No.

4 Q. Have you ever gone to a Canvassing Review Board  
5 meeting in Yakima County?

6 A. No.

7 Q. Why do you believe the ballot signature matching  
8 process in Yakima County is burdensome for Latino  
9 voters?

10 MR. MORFIN: Objection. Form.

11 A. I think it's because, I mean, it's -- it's hard  
12 for us I believe just because either our last names or  
13 our names in general get rejected. I couldn't see any  
14 other reason why.

15 Q. (By Ms. Castillo) So you believe your ballot  
16 signature was rejected in 2018 because of your last name  
17 and not because of a concern about forgery?

18 A. Correct.

19 Q. And on what basis do you have that belief?

20 MR. MORFIN: Objection. Form.

21 A. Because I have also heard about it and seen it  
22 from other people in general.

23 Q. (By Ms. Castillo) Where have you heard about  
24 it?

25 A. Just from co-workers from where I used to work,

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## C E R T I F I C A T E

STATE OF WASHINGTON )  
 )  
COUNTY OF YAKIMA )

This is to certify that I, Dani White, Certified Court Reporter in and for the State of Washington, residing at Yakima, reported the within and foregoing deposition; said deposition being taken before me on the date herein set forth; that pursuant to RCW 5.28.010 the witness was first by me duly sworn; that said examination was taken by me in shorthand and thereafter under my supervision transcribed; and that same is a full, true, and correct record of the testimony of said witness, including all questions, answers, and objections, if any, of counsel.

I further certify that I am not a relative or employee or attorney or counsel of any of the parties, nor am I financially interested in the outcome of the cause.

This transcript and billing has been prepared/ submitted for final preparation and delivery in accordance with all Washington State laws, court rules, and regulations.

Rules regulating formatting and equal terms requirements have been adhered to. Alterations, changes, fees, or charges that violate any of these provisions are not authorized by me and are not at my direction or with my knowledge.

IN WITNESS WHEREOF I have set my hand this 2nd day of June, 2023.

DANI WHITE  
CCR NO. 3352

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